

James R. Condo (#005867)
Amanda C. Sheridan (#027360)
SNELL & WILMER L.L.P.
One Arizona Center
400 E. Van Buren, Suite 1900
Phoenix, AZ 85004-2204
Telephone: (602) 382-6000
jcondo@swlaw.com
asheridan@swlaw.com

Richard B. North, Jr. (admitted *pro hac vice*)
Georgia Bar No. 545599
Matthew B. Lerner (admitted *pro hac vice*)
Georgia Bar No. 446986
NELSON MULLINS RILEY & SCARBOROUGH LLP
Atlantic Station
201 17th Street, NW, Suite 1700
Atlanta, GA 30363
Telephone: (404) 322-6000
richard.north@nelsonmullins.com
matthew.lerner@nelsonmullins.com

*Attorneys for Defendants
C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products
Liability Litigation

No. 2:15-MD-02641-DGC

**DEFENDANTS' MOTION FOR
EXTENSION AND DATE CERTAIN
FOR SEALING TRIAL EXHIBITS IN
JONES MDL CASE**

Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively "Bard") hereby respectfully move this Court, for an additional extension of the redaction request deadlines and to set a date certain for motions addressing the confidentiality of exhibits admitted into evidence during the *Jones v. Bard* trial.

The current redaction request deadline is August 30, 2018. Bard requests that the Court extend the deadline and set a date certain after the Pretrial Conference in *Hyde v. Bard* on September 6, 2018, when the Court has indicated that it will address the issues of redaction and sealing of exhibits. Bard only seeks the opportunity to seal certain exhibits

1 that were admitted in *Jones* and that were not admitted in *Booker* and were not addressed
 2 by the Court's prior rulings. Bard believes that this revised deadline will be more efficient
 3 for the parties and the Court in addressing these issues after the parties have further
 4 discussed it on September 6, 2018.

5 RESPECTFULLY SUBMITTED this 30th day of August, 2018.

6
 7 /s/ Richard B. North, Jr.

8 James R. Condo
 9 Amanda C. Sheridan
 10 One Arizona Center
 400 E. Van Buren, Suite 1900
 Phoenix, Arizona 85004-2202

11 Richard B. North, Jr. (admitted *pro hac vice*)
 Georgia Bar No. 545599
 12 Matthew B. Lerner (admitted *pro hac vice*)
 Georgia Bar No. 446986
 13 Nelson Mullins Riley & Scarborough LLP
 201 17th Street, NW / Suite 1700
 14 Atlanta, GA 30363

15 **Attorneys for C. R. Bard, Inc. and Bard**
 16 **Peripheral Vascular, Inc.**

Nelson Mullins Riley & Scarborough

LLP
 201 17th Street NW, Suite 1700
 Atlanta, GA 30363
 (404) 322-6000

CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2018, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to all attorneys of record.

s/ Richard B. North, Jr.

Nelson Mullins Riley & Scarborough

LLP
201 17th Street NW, Suite 1700
Atlanta, GA 30363
(404) 322-6000